

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS  
LIABILITY LITIGATION,

MDL NO. 2875

THIS DOCUMENT RELATES TO:

HON. ROBERT B. KUGLER  
DISTRICT JUDGE

*Sandra Meeks (Estate of Ronald Meeks)*

**SECOND AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF  
PLAINTIFF SANDRA MEEKS**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. will take the deposition upon oral examination of Sandra Meeks, as personal representative of the Estate of Ronald Meeks, on **July 14, 2021 at 8:30 a.m. CDT at One Galleria Boulevard, Suite 1100 Metairie, Louisiana 70001**. The court reporter will report the deposition in person and other counsel will be participating from various locations remotely. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Victoria J. Langton  
Greenberg Traurig LLP  
3333 Piedmont Road NE  
Suite 2500  
Atlanta, GA 30305  
(678) 553-7392  
langtont@gtlaw.com

Date: July 8, 2021

Respectfully submitted,

s/ Victoria J. Langton

Victoria J. Langton (GA Bar No. 444119)

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*Attorney for Teva Pharmaceuticals USA, Inc.,  
Teva Pharmaceutical Industries Ltd., Actavis  
LLC, and Actavis Pharma, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8<sup>th</sup> day of July, 2021, I caused a true and correct copy of the foregoing Second Amended Notice of Videotaped Deposition of Plaintiff Sandra Meeks to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was originally served on the following Plaintiffs' counsel by e-mail, with copies by e-mail to Counsel for Defendants, on July 8, 2021:

Daniel A. Nigh, Esq. (via email, counsel for Plaintiff)  
Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)  
Ruben Honik, Esq. (via email)  
David Stanoch, Esq. (via email)  
Conlee Whiteley, Esq. (via email)  
Jessica Priselac, Esq. (via email)  
Seth A. Goldberg, Esq. (via email)  
Clem C. Trischler, Esq. (via email)  
Sarah E. Johnston, Esq. (via email)

This 8<sup>th</sup> day of July, 2021.

s/ Victoria J. Langton  
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